

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA)	
)	
v.)	1:16-CR-228
)	
RUSLANS BONDARS,)	Trial: May 7, 2017
)	
Defendant.)	

DEFENDANT’S PROPOSED VOIR DIRE

COMES NOW the Defendant, Ruslans Bondars, by counsel, and offers the following proposed voir dire:

1. Has anyone (or your close friends or family) ever been employed by a law enforcement agency or applied to one for employment?
If so which one, and when?
2. Has anyone (or your close friends or family) ever been employed by an intelligence agency or applied to one for employment?
If so which one, and when?
3. Does anyone have a law degree or work as a practicing attorney?
If so, what kind of attorney?
4. Does anyone (or your close friends or family) work for the Department of Justice or a prosecutor’s office?
If so, which office?
5. Has anyone (or your close friends or family) ever had their identity stolen?
If so, what were the circumstances? What ended up happening?
6. Has anyone (or your close friends or family) ever been the victim of fraud
If so, what were the circumstances? What ended up happening?
7. Did anyone (or your close friends or family) have their credit card information compromised in the 2013 Target data breach?
If so, what were the circumstances? What was the result?
8. Does anyone work in the Information Technology business (“IT”)?
If so, in what regard? And for how long?

- If so, where do you obtain your information and how often?

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of May, 2018, I filed the foregoing pleading through the ECF system, which shall then send an electronic copy of this pleading to all parties in this action.

/s/

Yancey Ellis